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March 31, 2025

**VIA ECF**

Hon. J. Brendan Day, U.S.M.J.  
Clarkson S. Fisher Building  
& U.S. Courthouse  
Court Room: 7E  
402 East State Street  
Trenton, NJ 08608

**Re: Caleb L. McGillvary v. Ronald Riez, et al.  
Case No. 3:22-6430 (MAS-JBD)**

Dear Judge Day:

This office represents Defendant Rahmo Riez (“Defendant”) in the above-referenced matter, as well as non-party Rutgers, The State University of New Jersey (“Rutgers”) in connection with a subpoena served on Rutgers by Plaintiff (the “Subpoena”). We write to respectfully request a one-cycle adjournment to May 5, 2025, of Plaintiff’s pending motion to enforce the Subpoena (ECF No. 93) and motion to suppress Plaintiff’s deposition transcript (ECF No. 97).

As Plaintiff has incorrectly alleged that I made misrepresentations to the Court during the January 30, 2025 conference in connection with his motion to enforce the Subpoena, my office has ordered copy of the transcript of that Conference order to respond to Plaintiff’s motion. Although we ordered and paid for the transcript on an expedited basis, we will need additional time to prepare opposition to Plaintiff’s motion once we receive the transcript.<sup>1</sup>

We also request a one-cycle adjournment of Plaintiff’s motion to suppress his deposition transcript to allow sufficient time to respond and so both motions will be returnable on the same date.

Because Plaintiff is incarcerated, we are unable to obtain his consent to this request.

We thank Your Honor for the Court’s time and attention to this matter.

Respectfully submitted,

/s/ Margaret Raymond Flood  
Margaret Raymond-Flood

cc: Caleb McGillvary (via Regular Mail and FedEx)

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<sup>1</sup> Out of an abundance of caution, and to avoid further unnecessary motion practice by Plaintiff, my office will attach a copy of the transcript of the January 30, 2025 conference to our opposition papers.